

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
APEX LINEN SERVICE LLC, <i>et al.</i> , ¹) Case No. 20-11774 (LSS)
)
Debtors.) (Jointly Administered)

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
AUGUST 7, 2020 AT 2:00 P.M. (EDT)**

THIS HEARING WILL BE HELD TELEPHONICALLY AND BY VIDEO. ALL PARTIES WISHING TO APPEAR MUST DO SO TELEPHONICALLY BY CONTACTING COURTCALL, LLC AT 866-582-6878 NO LATER THAN AUGUST 7, 2020 AT 8:30 A.M. (ET) TO SIGN UP. ADDITIONALLY, ANYONE WISHING TO APPEAR BY ZOOM IS INVITED TO USE THE LINK BELOW. ALL PARTIES THAT WILL BE ARGUING OR TESTIFYING MUST APPEAR BY ZOOM AND COURTCALL. PARTICIPANTS ON COURTCALL SHOULD DIAL INTO THE CALL NOT LATER THAN 10 MINUTES PRIOR TO THE START OF THE SCHEDULED HEARING TO INSURE A PROPER CONNECTION

PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.

Topic: Apex Linen Service LLC 20-11774 (LSS)
Time: Aug 7, 2020 02:00 PM Eastern Time (US and Canada)

Join ZoomGov Meeting
<https://debuscourts.zoomgov.com/j/1600257035>

Meeting ID: 160 025 7035
Passcode: 942399

Join by SIP
1600257035@sip.zoomgov.com

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable are: Apex Linen Service LLC (9075), Highland Apex Holdings LLC (0537), Highland Avenue Capital Partners LLC (2825), Highland Apex GP LLC (9246), and Highland Apex Management LLC (5476). The location of the Debtors' corporate headquarters, and the business address for Apex Linen Service LLC is 6375 S. Arville Street, Las Vegas, NV 89118. The business address for all other Debtors is 205 Pier Avenue, Suite 102, Hermosa Beach, CA 90254.

MATTERS WITH CERTIFICATIONS OF COUNSEL FILED:

1. Motion of Debtors for Entry of Interim and Final Orders *Nunc Pro Tunc* to the Petition Date Authorizing (I) Continued Maintenance of Existing Cash Management System and Bank Accounts, (II) Use of Existing Business Forms, and (III) Related Relief [[Docket No. 7; Filed 7/8/2020](#)]

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received: None

Related Documents:

- A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [[Docket No. 25; Filed 7/9/2020](#)]
- B. Interim Order (I) Authorizing Debtors to Continue Maintenance of Existing Cash Management System and Bank Accounts, (II) Authorizing Debtors to Use of Existing Business Forms and (III) Granting Related Relief, *Nunc Pro Tunc* to the Petition Date [[Docket No. 29; Entered 7/10/2020](#)]
- C. Omnibus Notice of Pleadings and Final Hearing Thereon [[Docket No. 60; Filed 7/16/2020](#)]
- D. Certification of Counsel with Respect to Final Order (I) Authorizing Debtors to Continue Maintenance of Existing Cash Management System and Bank Accounts, (II) Authorizing Debtors to Use of Existing Business Forms, and (III) Granting Related Relief, *Nunc Pro Tunc* to the Petition Date [[Docket No. 126; Filed 8/5/2020](#)]

Status: The Debtors have filed a proposed final order by certification of counsel [Docket No. 126]. This matter is going forward only if the Court has questions.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (II) Deeming Utilities Adequately Assured of Future Performance, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing the Payment of Prepetition Administrative Fees Relating to Utility Services, and (V) Granting Related Relief [[Docket No. 8; Filed 7/8/2020](#)]

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received: None.

Related Documents:

- A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [[Docket No. 25; Filed 7/9/2020](#)]

- B. Certification of Counsel with respect to Interim Order (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (B) Authorizing the Payment of Prepetition Administrative Fees Relating to Utility Services, (C) Scheduling Final Hearing, and (D) Granting Related Relief [\[Docket No. 33; Filed 7/10/2020\]](#)
- C. Interim Order (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (B) Authorizing the Payment of Prepetition Administrative Fees Relating to Utility Services, (C) Scheduling Final Hearing, and (D) Granting Related Relief [\[Docket No. 38; Entered 7/14/2020\]](#)
- D. Omnibus Notice of Pleadings and Final Hearing Thereon [\[Docket No. 60; Filed 7/16/2020\]](#)
- E. Certification of Counsel with Respect to Final Order (A) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance, (C) Establishing Procedures for Determining Adequate Assurance of Payment, (D) Authorizing the Payment of Prepetition Administrative Fees Relating to Utility Services, and (E) Granting Related Relief [\[Docket No. 127; Filed 8/5/2020\]](#)

Status: The Debtors have filed a proposed final order by certification of counsel [Docket No. 127]. This matter is going forward only if the Court has questions.

- 3. Debtor's Application for Entry of an Order Authorizing the Debtors to (I) Employ and Retain GlassRatner Advisory & Capital Group LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, and (II) Designate Jeff Nerland as Chief Restructuring Officer for the Debtors Nunc Pro Tunc to the Petition Date [\[Docket No. 10; Filed 7/10/2020\]](#)

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received:

- A. Pre-Petition Lenders' Objection to Debtors' Applications to: (1) Employ, Retain, and Designate Chief Restructuring Officer, and (2) Employ and Retain Counsel [\[Docket No. 112; Filed 7/31/2020\]](#)

Related Documents:

- A. Notice of Hearing [\[Docket No. 31; Filed 7/10/2020\]](#)
- B. Certification of Counsel with respect to: (A) Orders Approving Retentions of Goldstein & McClintock LLP; GlassRatner Advisory & Capital Group, LLC; and FocalPoint Securities, LLC; and (B) Resolving Other Matters Between Debtors and Pre-Petition Lenders [\[Docket No. 114; Filed 8/3/2020\]](#)

- C. Notice of Withdrawal upon Entry of Agreed Order of Pre-Petition Lenders' Objection to Debtors' Applications to: (1) Employ, Retain, and Designate Chief Restructuring Officer, and (2) Employ and Retain Counsel [\[Docket No. 122; Filed 8/4/2020\]](#)

Status: The Debtors have filed a proposed order by certification of counsel [Docket No. 114]. This matter is going forward only if the Court has questions.

4. Application of Debtors Pursuant to 11 U.S.C. § 327(a) for Authority to Employ and Retain Goldstein & McClintock LLP as Counsel for the Debtors, Nunc Pro Tunc to the Petition Date [\[Docket No. 43; Filed 7/14/2020\]](#)

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received:

- A. Pre-Petition Lenders' Objection to Debtors' Applications to: (1) Employ, Retain, and Designate Chief Restructuring Officer, and (2) Employ and Retain Counsel [\[Docket No. 112; Filed 7/31/2020\]](#)

Related Documents:

- A. Certification of Counsel with respect to: (A) Orders Approving Retentions of Goldstein & McClintock LLP; GlassRatner Advisory & Capital Group, LLC; and FocalPoint Securities, LLC; and (B) Resolving Other Matters Between Debtors and Pre-Petition Lenders [\[Docket No. 114; Filed 8/3/2020\]](#)
- B. Notice of Withdrawal upon Entry of Agreed Order of Pre-Petition Lenders' Objection to Debtors' Applications to: (1) Employ, Retain, and Designate Chief Restructuring Officer, and (2) Employ and Retain Counsel [\[Docket No. 122; Filed 8/4/2020\]](#)

Status: The Debtors have filed a proposed order by certification of counsel [Docket No. 114]. This matter is going forward only if the Court has questions.

5. Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328 for Authority to Employ and Retain FocalPoint Securities, LLC as Investment Banker for the Debtors, Nunc Pro Tunc to July 10, 2020 [\[Docket No. 69; Filed 7/19/2020\]](#)

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received:

- A. Breakwater Management LP's Opposition to Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328 for Authority to Employ and Retain FocalPoint Securities, LLC as Investment Banker for the Debtors, Nunc Pro Tunc to July 10, 2020 [\[Docket No. 111; Filed 7/31/2020\]](#)

Related Documents:

- A. Certification of Counsel with respect to: (A) Orders Approving Retentions of Goldstein & McClintock LLP; GlassRatner Advisory & Capital Group, LLC; and FocalPoint Securities, LLC; and (B) Resolving Other Matters Between Debtors and Pre-Petition Lenders [[Docket No. 114; Filed 8/3/2020](#)]
- B. Notice of Withdrawal upon of Breakwater Management LP's Opposition to Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328 for Authority to Employ and Retain FocalPoint Securities, LLC as Investment Banker for the Debtors, *Nunc Pro Tunc* to July 10, 2020 [[Docket No. 121; Filed 8/4/2020](#)]
- C. Certification of Counsel With Respect to Order Authorizing the Employment of FocalPoint Securities LLC as Investment Banker, *Nunc Pro Tunc* To July 10, 2020 [[Docket No. 125; Filed 8/4/2020](#)]

Status: The Debtors have filed a revised proposed order by certification of counsel [Docket No. 125]. This matter is going forward only if the Court has questions.

MATTERS GOING FORWARD:

- 6. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (II) Granting Related Relief [[Docket No. 11; Filed 7/8/2020](#)]

Objection Deadline: No deadline set.

Objections Received: None.

Related Documents:

- A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [[Docket No. 25; Filed 7/9/2020](#)]
- B. Certification of Counsel with respect to Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors; (II) Scheduling Further Interim Hearing; and (III) Granting Related Relief [[Docket No. 57; Filed 7/16/2020](#)]
- C. Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors; (II) Scheduling Further Interim Hearing; and (III) Granting Related Relief [[Docket No. 71; Entered 7/20/2020](#)]

D. Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [[Docket No. 80; Filed 7/21/2020](#)]

E. Debtors' Reply to Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [[Docket No. 85; Filed 7/22/2020](#)]

Status: This matter is going forward only to schedule a final hearing.

7. Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [[Docket No. 32; Filed 7/10/2020](#)]

Objection Deadline: July 31, 2020 at 4:00 p.m. EDT

Objections Received:

A. Breakwater Management LP's Objection to Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [[Docket No. 110; Filed July 31, 2020](#)]

Related Documents: None.

Status: This matter is going forward.

8. Debtors' Emergency Motion for an Interim Order: (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing; (II) Granting Liens and Superpriority Administrative Expense Status; (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Authorizing Use of Cash Collateral; (VI) Scheduling a Final Hearing; and (VII) Granting Further Relief [[Docket No. 119; Filed 8/3/2020](#)]

Status: This matter is going forward with respect to interim relief requested.

Respectfully submitted,

Dated: August 5, 2020

GOLDSTEIN & MCCLINTOCK, LLP

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